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Attorneys at Law

March 16, 2020

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BY ECF

The Honorable Gregory H. Woods
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: *Williams v. Construction Realty Services Group, Inc., et al.*
Case No.: 19-cv-02973 (GHW)

Dear Judge Woods:

My firm represents Plaintiff Tierra Williams in the above-referenced matter. I am in receipt of the Court's order adjourning the trial date due to coronavirus concerns. With the consent of counsel for Defendants, I write to request a four week adjournment of the deadline for submission of pre-trial materials, currently March 19, 2020, until April 17, 2020, and to inform the Court of the status of this action.

As I believe the parties have informed the Court, settlement discussions relating to this action, as well as to several other actions against Defendants, have been conducted in connection with an investigation of Defendants by the New York State Attorney General's Office. I was informed last week that a settlement in principle had been reached which would apply to Ms. Williams' claims in this action. It will, however, take some time, perhaps several weeks, for the settlement to be finalized and approved on both sides as well as several months for the settlement payments to be made.

While I am not prepared to dismiss the action, especially because neither Ms. Williams nor myself are direct parties to the settlement, I believe it would be prudent to adjourn the date for submission of pre-trial materials so that neither the parties nor the Court expend resources on preparing for a trial that it appears will not be necessary.

In addition, while it may be the Court's practice, as it is the practice of other judges of the Court, to dismiss cases with leave to renew upon notification that a settlement in principle has been reached, I request that the Court not do so here, and in fact I request that the Court leave the case open, or at minimum condition any dismissal with leave to renew, for the period until the settlement moneys are paid, which should be no more than six months. I understand this is an unusual request, but it is also an unusual situation, as Ms. Williams is, apart from a claim as third party beneficiary of the Attorney General's settlement, dependent upon Defendants and the Attorney General to obtain relief. I believe it is appropriate for Ms. Williams to have the ability to pursue her case if the settlement falls through or the money is not paid.

Thank you for your attention to this matter. To the extent the Court has questions, the parties are available at the Court's convenience for a conference or telephone conference.

Sincerely yours,

/s


Jason L. Solotaroff

cc: Lisa Skruck, Esq.

Application granted. The deadline to submit pre-trial materials is extended from March 19, 2020 to April 17, 2020.

SO ORDERED.

Dated: March 17, 2020
New York, New York



GREGORY H. WOODS
United States District Judge